

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DISTRICT**

JP MORGAN CHASE BANK, NATIONAL
ASSOCIATION,

Plaintiff,

v.

ROBERT KOWALSKI, AKA ROBERT M.
KOWALSKI; UNKNOWN OWNERS AND
NON-RECORD CLAIMANTS; CHICAGO
TITLE LAND TRUST COMPANY s/i/i TO
BRIDGEVIEW BANK GROUP FKA
BRIDGEVIEW BANK AND TRUST COMPANY,
AS TRUSTEE UNDER TRUST AGREEMENT
DATED APRIL 24, 1993 AND KNOWN AS
TRUST NUMBER 1-2228; MARTHA
PADILLA; FEDERAL DEPOSIT INSURANCE
CORPORATION, AS RECEIVER FOR
WASHINGTON FEDERAL BANK FOR
SAVINGS,

Defendants.

Case No. 1:19-CV-05770

1512 W. Polk Street
Chicago, IL 60607

JOINT STATUS REPORT ON DISCOVERY

The parties hereby jointly submit this Status Report on Discovery pursuant to Court Order.

(See Dkt. 153).

A. PROGRESS ON DISCOVERY

1. Plaintiff JPMorgan Chase Bank, N.A., Defendant Federal Deposit Insurance Corporation, as Receiver for Washington Federal Bank for Savings and Defendant Martha Padilla continue to issue and respond to written discovery requests and subpoenas pursuant to the discovery schedule and deadline for completion of fact discovery by September 30, 2021.

2. The remote deposition of Defendant Martha Padilla is noticed for September 21, 2021.

3. Discovery remains stayed as to Third-Party Defendant First Midwest Bank. (*See* Dkt. 141.)

B. PROGRESS ON SETTLEMENT DISCUSSIONS.

There has not been any significant progress on settlement since the settlement conference on May 13, 2021.

C. ANY OTHER ISSUES TO REPORT TO THE COURT.

First Midwest Bank's *Motion to Dismiss Padilla's First Amended Third-Party Complaint* is now fully briefed.

SUBMITTED JOINTLY AND BY AGREEMENT OF THE PARTIES:

Date: August 30, 2021

**PLAINTIFF JPMORGAN CHASE BANK,
NATIONAL ASSOCIATION**

/s/ Shana A. Shifrin

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**DEFENDANT FEDERAL DEPOSIT
INSURANCE CORPORATION,
AS RECEIVER FOR WASHINGTON
FEDERAL BANK FOR SAVINGS**

/s/ Jordana E. Thomadsen

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DEFENDANT MARTHA PADILLA

/s/ Joseph R. Ziccardi

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**THIRD-PARTY DEFENDANT FIRST
MIDWEST BANK**

/s/ Adam B. Rome

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